

Steven D. Cook

Global HSE Counsel

Direct Line: 713.309.4629 Facsimile: 713.309.4631

April 11, 2012

Red EPA APR 16 2012



Mr. Andrew Goldman Senior Assistant Regional Counsel (3RC41) U.S. Environmental Protection Agency, Region III 1650 Arch Street Philadelphia, PA 19103-2029

Re: US EPA Request for Information Pursuant to CERCLA, Section 104(e), for Lyondell Chemical Company, Newtown Square, Pennsylvania Facility, dated March 9, 2012 and received March 12, 2012, regarding the Metro Container Site, Trainer, Pennsylvania

Dear Mr. Goldman:

Provided herein is additional information pertaining to Lyondell Chemical Company's ("Lyondell") emergence from bankruptcy and settlement agreement with the United States as part of the bankruptcy process. This information is provided as a follow-up to your telephone conversation of March 28, 2012, with Jason Van Loo, HSE Counsel for Lyondell.

A. Bankruptcy Details and Terms of the Settlement Agreement with the United States

1. Background

Lyondell and certain of its affiliated entities (collectively, the "Reorganized Debtors," or during the chapter 11 cases, the "Debtors") filed for bankruptcy protection under chapter 11, title 11 of the United States Code (the "Bankruptcy Code") on January 6, 2009, in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") under the caption In re Lyondell Chemical Co., et al., Case No. 09-10023 (REG) (jointly administered). On or about January 7, 2009, the Debtors served a Notice of Commencement of Chapter 11 Cases and First Day Motions on the United States.

On or about May 27, 2009, the Debtors served an amended notice of the bar date requiring filing of proofs of claim by June 30, 2009 on the United States. The United States on behalf of the U.S. Environmental Protection Agency ("<u>EPA</u>"), the United States Department of Interior, and the National Oceanic and Atmospheric Administration filed proofs of claim (Claim Nos. 11940,

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11941, 12968, 12969, 12970, 12971, 12972, 12973, 12974, and 279491) against the Debtors. In March, 2010 the Debtors entered into a Settlement Agreement with the United States (*see*, <u>Exhibit A</u>, attached).

2. Settlement Agreement

The Metro Container Site (the "Site") was included within the terms of the Settlement Agreement and defined as a "U.S. Additional CERCLIS/NPL Site" (see, Exhibit A, Settlement Agreement at Exhibit C, Item 4). Section XII of the Settlement Agreement addresses treatment of "Additional Sites", including the Site. Paragraph 24 of the Settlement Agreement discusses permissible enforcement activities undertaken by the "Settling Federal Agencies" (including the EPA) under the terms of the Settlement Agreement. This Paragraph provides that the EPA, "may seek to obtain a judgment of liability of the Debtor or enter into a settlement with the Debtor with regard to the Additional Site in the manner and before the administrative or judicial tribunal in which the Settling Federal Agencies' claims...would have been resolved or adjudicated if the Bankruptcy Cases had never been commenced." Paragraph 24 also provides that,

"the Debtors and the Settling Federal Agencies...will attempt to settle each liability or obligation asserted by the Settling Federal Agencies...against any Debtor relating to an Additional Site on a basis that is fair and equitable under the circumstances, including consideration of (i) settlement proposals made to other potentially responsible parties who are similar to the Debtor in the nature of their involvement with the site, (ii) the fact of the Debtor's bankruptcy, and (iii) the circumstances of this Settlement Agreement; but nothing in this sentence shall create an obligation of the Settling Federal Agencies, DTSC, or the LA Regional Board that is subject to judicial review."

Finally, Paragraph 24 preserves all rights, claims and defenses available to the Debtors and the Settling Federal Agencies.

Paragraph 25 of the Settlement Agreement provides details on the funds available for resolution of claims brought under Paragraph 24. Under Paragraph 25, the Site is treated as follows:

"In the event any liability is liquidated pursuant to Paragraph 24 by settlement or judgment to a determined amount (the "Determined Amount"), the Debtor(s) with which such settlement is made or against which such judgment is entered will satisfy such liability within thirty days after the later of the effective date of the Plan of Reorganization or the date on which the settlement or judgment is final and effective (the "Settlement/Judgment Date") as follows: (a) for DTSC Additional NPL Sites and U.S. Additional CERCLIS/NPL Sites, by providing DTSC or the respective Settling Federal Agency the "Distribution Amount" to the extent that any funds are available under the Plan of Reorganization, including any disputed claim reserve, to make distributions to holders of Allowed General Unsecured Claims against the Debtor(s) in question... The Distribution Amount shall be the value of the consideration which

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would have been distributed under the Plan of Reorganization to the holder of such Claim if the Determined Amount had been an Allowed General Unsecured Claim in such amount under the Plan of Reorganization."

Therefore, under Paragraph 25 the EPA is entitled to a "Distribution Amount" to the extent that any funds are available under the Reorganization Plan (detailed below in Part 3). When the funds under the Reorganization Plan are spent, no additional funds will be available.

3. Bankruptcy Exit and Reorganization Plan

On April 23, 2010, the Bankruptcy Court entered an order [Docket No. 4418] (the "<u>Confirmation Order</u>," confirming the Debtors' Third Amended Joint Chapter 11 Plan of Reorganization for the LyondellBasell Debtors (the "<u>Reorganization Plan</u>") and on April 30, 2010 (the "<u>Effective Date</u>"), the Reorganized Debtors emerged from bankruptcy.

Under the Bankruptcy Code, the Bankruptcy Court's confirmation of a plan of reorganization provides a "discharge" to a debtor, regardless of whether the creditor filed a proof of claim. The discharge extinguishes all debts and claims arising against a debtor that arose prior to confirmation. Section 1141(d) (1) of the Bankruptcy Code states: "the confirmation of a plan . . . discharges the debtor from any debt that arose before the date of such confirmation." 11 U.S.C. § 1141(d)(1). Concurrently, section 524(a)(2) of the Bankruptcy Code provides that this discharge "operates as an injunction against the commencement or continuation of an action, the employment of process, or an act, to collect, recover or offset any such debt" 11 U.S.C. § 524(a)(2); see also Kuhl v. United States, 467 F.3d 145, 147 (2d Cir. 2006) ("A discharge in bankruptcy operates as an injunction against collection of any discharged debts.").

The terms of the Settlement Agreement, provisions of the Bankruptcy Code, Section 11.5 of the Reorganization Plan and Section 35 of the Confirmation Order discharged and terminated all existing debts and claims, of any kind, nature or description whatsoever against or in the Debtors or any of their assets or properties to the fullest extent permitted by the Settlement Agreement and the Bankruptcy Code, and permanently enjoined and forbade the pursuit of such discharged claims. Please take notice that the automatic stay of section 362 of the Bankruptcy Code was replaced on the Effective Date by the discharge and permanent injunction found in the Confirmation Order, Section 11.5 of the Plan and sections 1141(d) and 524(a) of the Bankruptcy Code (such provisions, collectively, the "Discharge Injunction").

In summary, under the terms of the Settlement Agreement and Discharge Injunction, EPA may pursue cost recovery for the Site to the extent funds (a Discharge Amount) are available under the Reorganization Plan.

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If additional information is needed, please contact me at 713.309.4629.

Respectfully submitted,

LYONDELL CHEMICAL COMPANY

Steven D. Cook

Global HSE Counsel

cc:

Mr. Kenneth I. Rose, Financial Analyst (3HS62)

United States Environmental Protection Agency, Region III

1650 Arch Street

Philadelphia, PA 19103-2029

Attachments:

Exhibit A: Settlement Agreement entitled "Settlement Agreement Among the Debtors, the Environmental Custodial Trust Trustee, the United States, and Certain State Environmental Agencies

EPA's investigation of the Metro Container Site has revealed the presence of hazardous substances including, but not limited to, volatile organic compounds such as benzene, tetrachloroethylene, toluene, and tricholoroethylene; polycyclic aromatic hydrocarbons such as anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(a)fluoranthene, benzo(g,h,i)perylene, benzo(k)fluoranthene, and chrysene; PCBs such as Aroclor-1248, Aroclor-1254, and Aroclor-1260; and metals such as antimony, arsenic, cadmium, lead, mercury, nickel, thallium, and zinc.

- 1. EPA has information which indicates that you sent drums to the Metro Container Site between 1980-1988 from one or more of your facilities. For each such facility, identify:
 - a) the address of the facility; and
 - b) the products/materials produced at such facility between 1980-1988.

Response:

- a) Lyondell Chemical Company, 3801 West Chester Pike, Newtown Square, PA 19073
- b) The Newtown Square Facility is a research and development facility which does not produce products/materials.
- 2. Identify the processes used between 1980-1988 to produce the products/materials identified in response to Question #1.

Response:

See response to Question 1(b), above.

3. Identify the raw materials used in the processes identified in response to Question #2.

Response:

See response to Question 1(b), above.

4. Identify all wastes and by-products generated between 1980-1988 from the processes identified in response to Question #2.

Response:

This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.

- 5. For each raw material and waste/by-product identified in response to Questions #3 and #4:
 - a) Identify the chemical composition.

- b) Provide a copy of all documents referring to or related to the composition of such raw material and waste/by-product including, but not limited to, chemical analyses performed on such raw materials and wastes/by-products; and
- c) Identify how each waste/by-product was disposed of between 1980 and 1988.

Response:

- a) This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.
- b) This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.
- c) This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.
- 6. Identify all chemicals/constituents that would have been present in drums present at any time between 1980-1988 at the facilities identified in response to Question #1(a).

Response:

This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.

7. Identify the number of drums/containers sent to the Metro Container Site from the facilities identified in response to Question #1;

Response:

This information is provided in Appendix B at Exhibit I. See also, the attached document in Appendix B found in our files and dated 3/5/89 entitled "PRPs in Order of Drums Contributed (1985, 1986, and 1987)", which notes that Arco Chemical Co. sent 3,287 drums (Arco Chemical Co. should not be confused with Arco Petroleum Products Co., which is a separate, unrelated company).

8. Identify the procedures used to determine which drums present at any time at your facilities would be sent to the Metro Container Site.

Response:

This information is provided in Appendix B, see responses to Questions 3, 5 & 8 at Exhibit I.

9. Identify the chemicals/constituents contained in the drums you sent to the Metro Container Site.

Response:

This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.

10. If you assert in response to Question #9 that some or all of the drums sent to the Metro Container Site were empty, identify the chemicals/constituents that would have been in the drums before they were emptied.

Response:

This information is provided in Appendix B, see responses to Questions 1&2 at Exhibit I.

11. Identify, and provide a copy of, all contracts and agreements between you and Metro Container Corporation or any related entity under which drums were sent from your facilities to the Metro Container Site.

Response:

This information is provided in Appendix B, see responses to Questions 3, 5 & 8 at Exhibit I.

12. Provide the name, title, address, and telephone number of the person answering these questions on your behalf. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers.

Response:

- 1. Mr. Steven Cook Global HSE Counsel Lyondell Chemical Company LyondellBasell Tower 1221 McKinney St., Suite 700 Houston, Texas 77010 (713) 309-4629
- 2. Mr. Jason Van Loo HSE Counsel Lyondell Chemical Company LyondellBasell Tower 1221 McKinney St., Suite 700 Houston, Texas 77010 (713) 309-7514
- 13. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
 - a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.);
 - c. The approximate date of destruction;
 - d. A description of information that would have been contained in the documents; and,
 - e. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response:

a) The documentation supplied to EPA in 1988 and supplied again through this response is believed to be complete at the time it was compiled.

- b) Not applicable.
- c) Not applicable.
- d) Not applicable.
- e) Not applicable.
- 14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information that you provide in a response to this request should include the party's name, address, type of business, and the reasons why you believe that the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response:

This information is provided in Appendix B, see responses to Question 6 at Exhibit I.

-SCO Chemical Co. Inv. 3301 West Chester Pike Newtown Square, Pennsylvania 19073 Telephone 215 359 2212



J. W. Chupein, Manager Environmental Services

May 10, 1988

Mr. Lawrence Falkin U.S. Environmental Protection Agency, Region III CERCLA Removal Enforcement Section (3HW14) 841 Chestnut Building, 6th Floor Philadelphia, PA 19107

Re: Metro Container Corporation Site

Dear Mr. Falkin:

As requested in your memorandum of April 12, 1988, ARCO Chemical Company submits the enclosed information and documents (Exhibit I) pertaining to our business transaction with the Metro Container Corporation located at Second and Pine Streets, Trainer, PA 19013.

If you have any questions concerning the material submitted, please contact Mr. V. Peter Wynne, Senior Counsel at 215/359-3203.

Very truly yours,

Joseph W. Chupein

JWC/tv att

Exhibit I

ARCO CHEMICAL COMPANY

Re: Metro Container Corporation Site

Questions 1 & 2:

The types of hazardous substances that were sent to the site from the ARCO Chemical Company's Newtown Square Research and Engineering facility generally fall into the EPA classification of D001 and F005. Note that these materials would be the "wetted wall" residuals of empty unwashed 55 gallon drums. We estimate that each drum contained no more than a quarter of a pint of residue. Accordingly, we calculate that we sent to the site 80 gallons of waste in the 2600 unwashed drums over a period of eight years. Over the same time period, we purchased approximately 3700 reconditioned 55 gallon steel drums from Metro Container Corporation for use at the Newtown Square facility.

Ouestion 3:

Attachment I contains the documents/invoices detailing the dates and number of containers sent to the "site" for reclamation from March, 1983 to November, 1987, the time frame within which we conducted these transactions.

Question 4:

The review of our files indicates there was no correspondence between ARCO Chemical Company and any regulatory agency regarding these substances and/or containers.

Ouestion 5:

See Question 3 and/or Attachment I.

Question 6:

We do not have any documents in our custody relating to any other persons who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, of transportation of such substances and/or containers to the "site".

Ouestion 7:

We do not have any documents in ARCO Chemical Company custody that are related to deeds, rights-of-way or other real interests in the "site".

Ouestion 8:

The containers described above were sent to the "site" for reconditioning and resale by Metro Container Corporation.

The documents contained in Attachment I were obtained from the ARCO Chemical Company's Accounts Payable Department. The original documents are maintained in the custody of the Accounts Payable Department which is located at the Newtown Square facility.

We are currently in the process of determining what insurance coverage is available for hazardous waste sites both here and at other sites. Accordingly, we are not in a position to respond to this question at this time.

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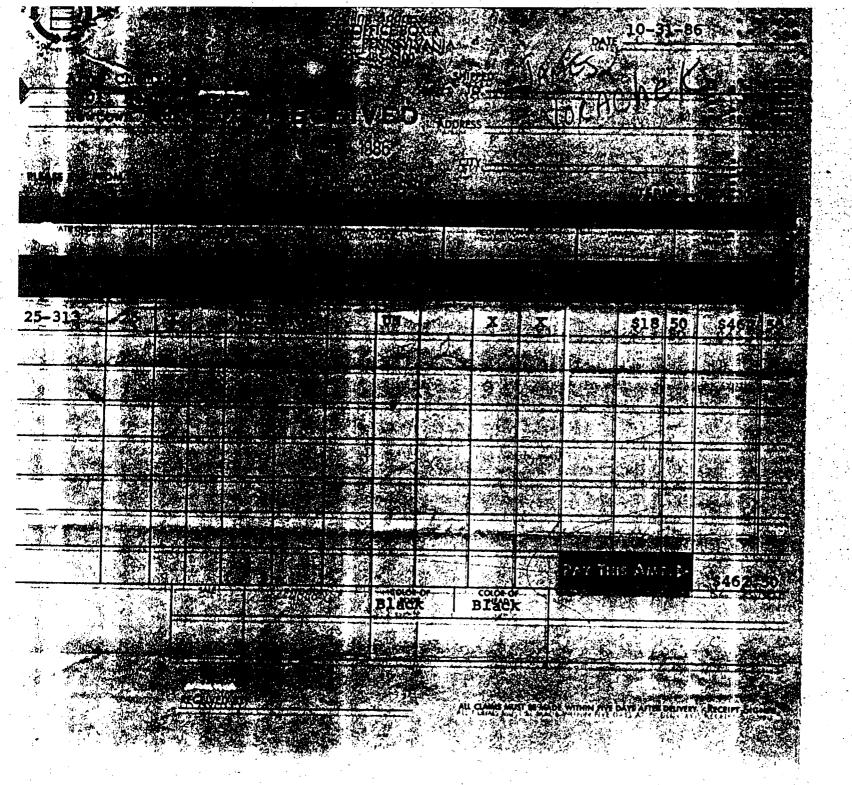
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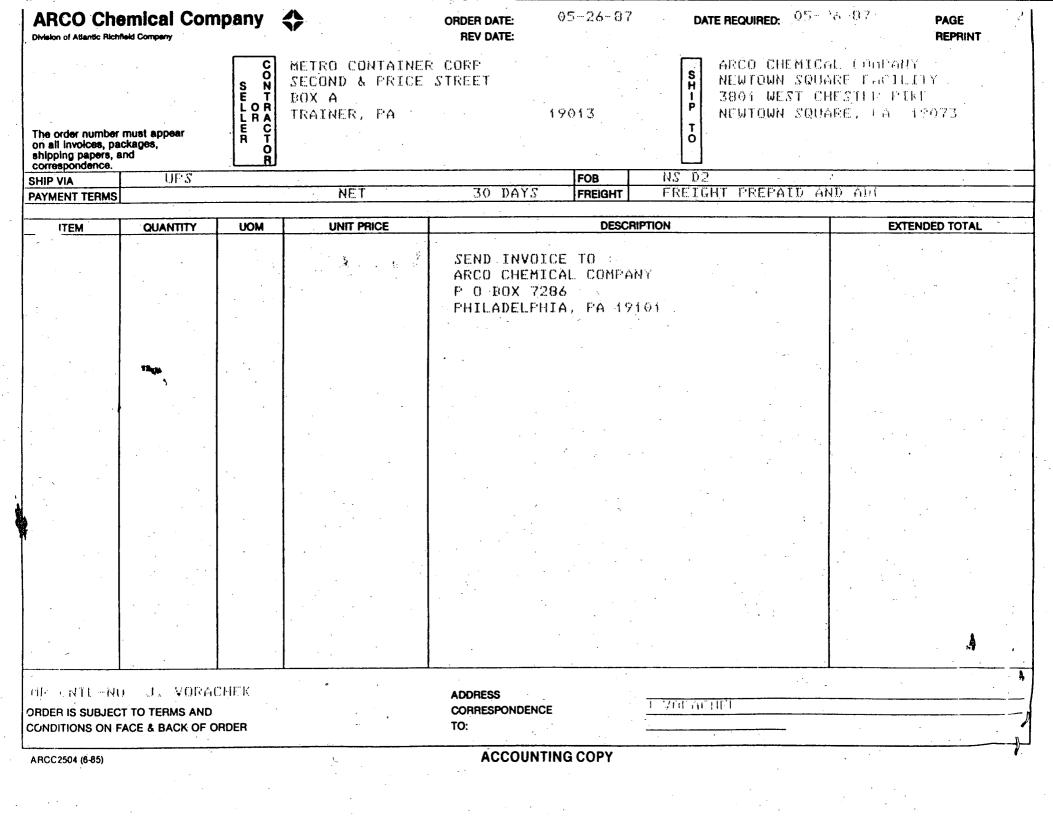
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Metro-Enterprise Containe Corp.

Mailing Address: POST OFFICE BOX A CHESTER; PENNSYLVANIA 215-485-6100

DATE _____5/1/87

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METRO CONTAINER CORP. P.O. Box A Second & Price Streets TRAINER, PENNSYLVANIA 19016 1917 (215) 485-6100 SALESPERSON DATE OF INVOICE 5/1/87 SHIP TO Arco Chemical Corp. 3801 West Chester Pike Newtown Square PA 5. H. VORACHEK 19073 JUNT NO. The state of the s DATE SHEETS 75 5/1/87 Our Truck N 10 Days YTITIV CONTRACTOR N AMOUNT 310 55 Gallon HF Drums \$12.50 \$625.00 Painted: Black & White

Thank You

TOTAL

\$625.00

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ARCO Che	mical Com eld Company	pany	♦	ORDER DATE: REV DATE:	05 - 26 - 87	DATE REQUIRED:	PAGE REPRINT
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ARCC2504 (6-85)

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DATE ____5/1/87

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DISCOUNT AMT: 00 PRORATE TRAINER, PA 19013 CODE: PAO - ESEMPO FROM PA. USE TAX NET DAYS: SO U/P: D DUE DATE: 10/15/87 CREATED: 10/07/87 UPDATED: 10/07/87 A/P CLERK: VVJ BANK CO: BANK NO: CHECK NO: COCCCCCC DATE TO NAD: 10/27/87 PUR GROUP: NS PO NUMBER: 8 0028 0042 008 MATCH-IND: Y SEP HAND: SEP CHECK: CHECK DESC: QUANTITY UDM PRICE AMOUNT FRT TAX DISC UPDATED 0001 0001 75.0000 EA 0001 (Pg) 75.0000 EA 12.50000 937.50 EX 12.50000 937.50 EX PUR GROUP: NS PD NUMBER: B 0028 0042 008 PD LINE: 0001 10/07/87 CHARGE TO: F 81404638A0425

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Division of Atlantic Richfield Company

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Metro Container Corp.

2nd & PRICE ST. • TRAINER, PA 19013 (215) 485-6100

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Metro Container Corp. 2nd & PRICE ST. • TRAINER, PA 19013

(215) 485-6100

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Universal Container Corporation

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UNIVERSAL CONTAINER STEEL DRUM CORPORATION

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Second & Price Street
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UNIVERSAL CONTAINER STEEL DRUM CORPORATION Universal Container Corporation

Second & Price Street

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ARCO Chemical Company

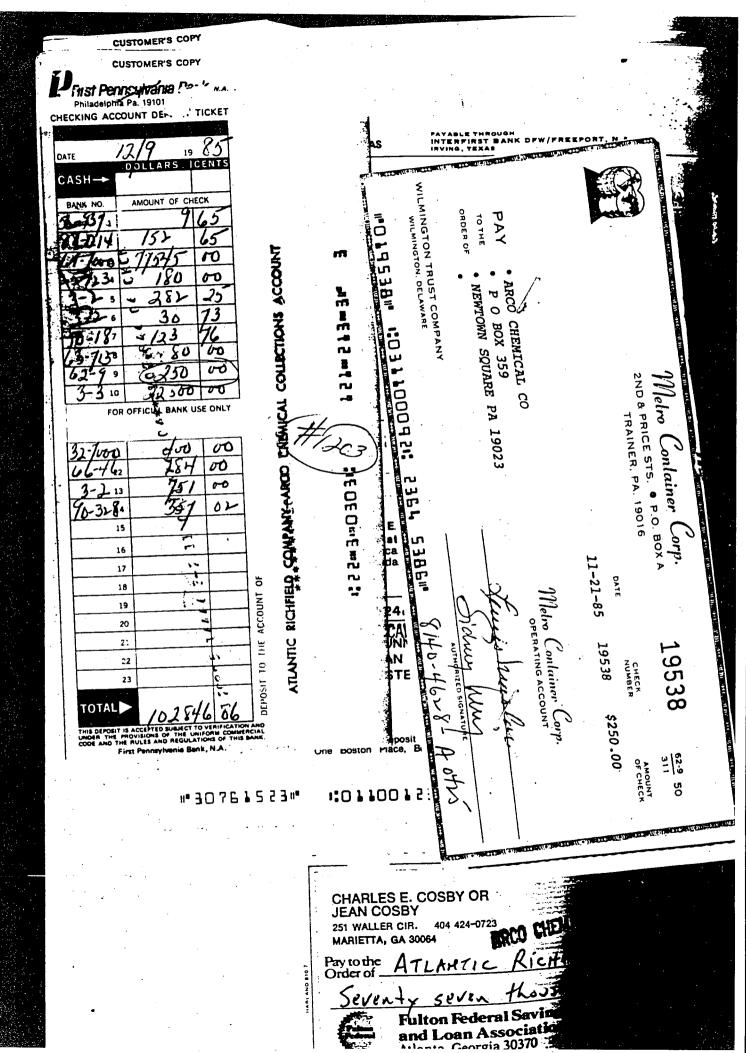
Division of AtlanticRichfieldCompany

Short Form - Original - Not Negotiable

Aeceived, subject to the classifications and tariffs in

effect on the date of issue of this Bill of Lading. and condition of contents of packages unknown), marked, consigned, and destined as indicated below Subject to Section 7 of conditions of applicable bill of lading, if this shipment is to be delivered to the consignoe will out recourse on the consignor the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

ARCO Chemical Company
Division of AtlanticRichfieldCompany person or corporation in possession of the property under the contractlyagreea(to,carry to its on the route to said destination. It is multially agreed, as to each carrier of all or after one interested in all or any of said property, that every service to be performed hereunder set forth (1) in Official, Southern, Western and Illinois Freight Classifications in effect on when said carrier (like word carrier being understood usual place of delivery at said destination, if on its rot said property over all or any portion of said route to shall be subject to all the terms and conditions of the the date heroof if this is a rail or a rail-water shipmer heroof property certifies, that he is familiar Shipper's number Carrier's number Carrier If charges are to be prepaid, write or stamp here. To be Prepaid for purposes of notification only.) Received \$ to apply in prepayment of the charges on the property described hereon Consigned to (Ma County Destination Delivery address (to be filled in only when shipper desires and governing tariffs provide for delivery thereat.) (The signature here acknowledges only the , amount prepaid) Charges Advanced Route Delivering carrier Weight Class or rate 'Weight (sub. to cor.) No of pkgs cars Kind of package, description of articles special Class or Ck. Kind of package, description of articles special marks and exceptions. Drums returned (For Credit) 101 This shipment is correctly Special instructions: described Correct weight is_ Subject to verification by th Eastern Weighing and Insp Bureau Code: According to Agreement n 17900 Inches in Gallons Total gailons Weight per Total weight Car Shell cap in Outages gallon dome in domes Weighted at gallons Inches Gallons Initial Number Gross Net " If the shipment moves between two ports by a carrier by water the law requires that the bill of lading shall state whether it is carrier's or shipper's weight This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transp tation, according to the applicable regulations of the Department of Transportation. ARCO Chemical Company — Division of Atlantic Richfield Company Agent Per Permanent post-office address of shipper, P.O. Box 8526, Philadelphia, Pa. 19101, USA ARCC-809-1-C (7-80)



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Netro Container Corporation

Second & Price Street
Trainer, Pennsylvania 19013 (215) 494-8200

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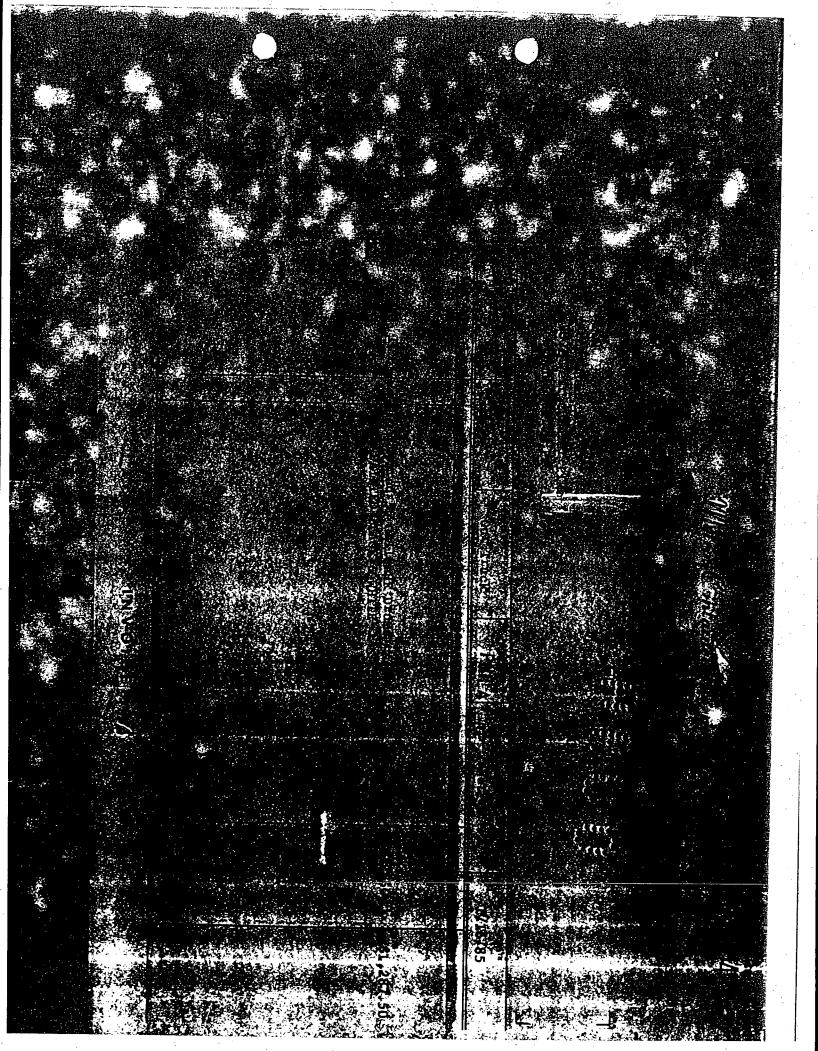
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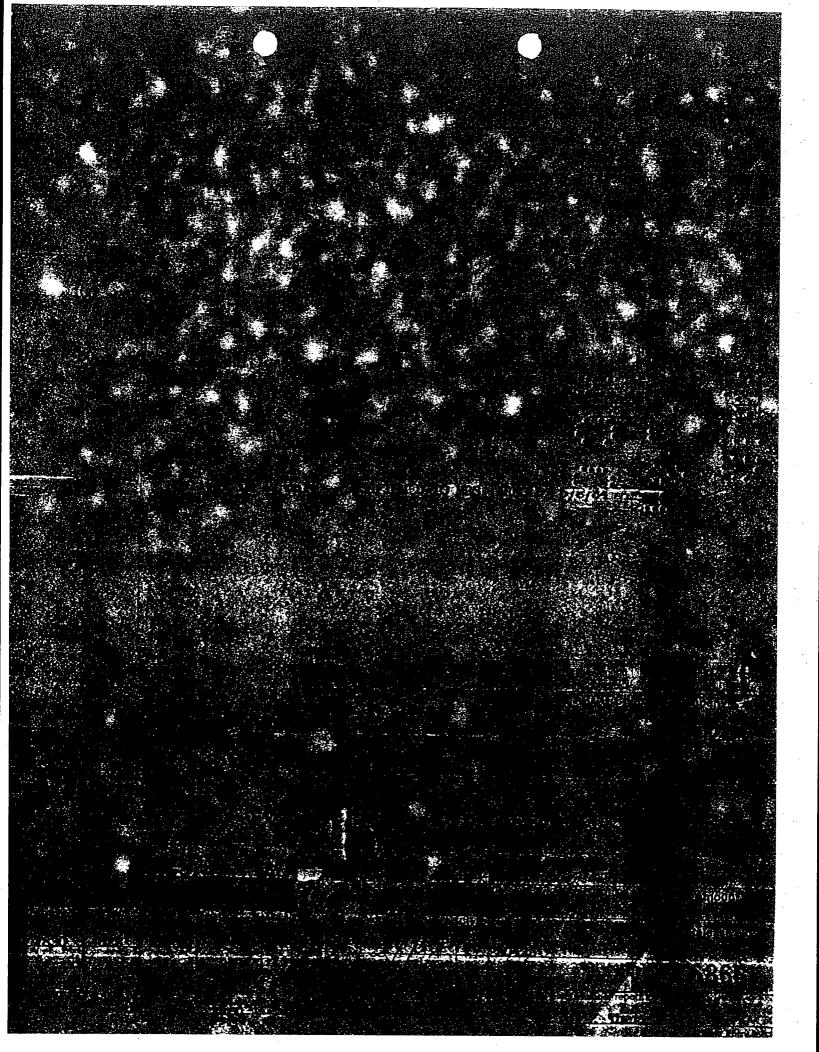
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Metro Container Corp.

2ND WERREL STS . P.O. HOLE

TRAINER PA 19016

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\$324.00**

PAY

. ARCO CHEMICAL CO

. P O BOX 359

NEWTOWN SQUARE PA 19023

Service of

WILMINGTON TRUST COMPANY

#*O18181# *:031100092# 2364 5386#



Melro Container Corp.

2ND & PRICE STS. P.O. BOX A TRAINER, PA. 19016

18181

NUMBER

6-13-85

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ARCO CHEMICAL CO.

. ARCO CHEMICAL CO

P O BOX 359

NEWTOWN SQUARE PA 19023

ORDER OF

Melro Container Corp.

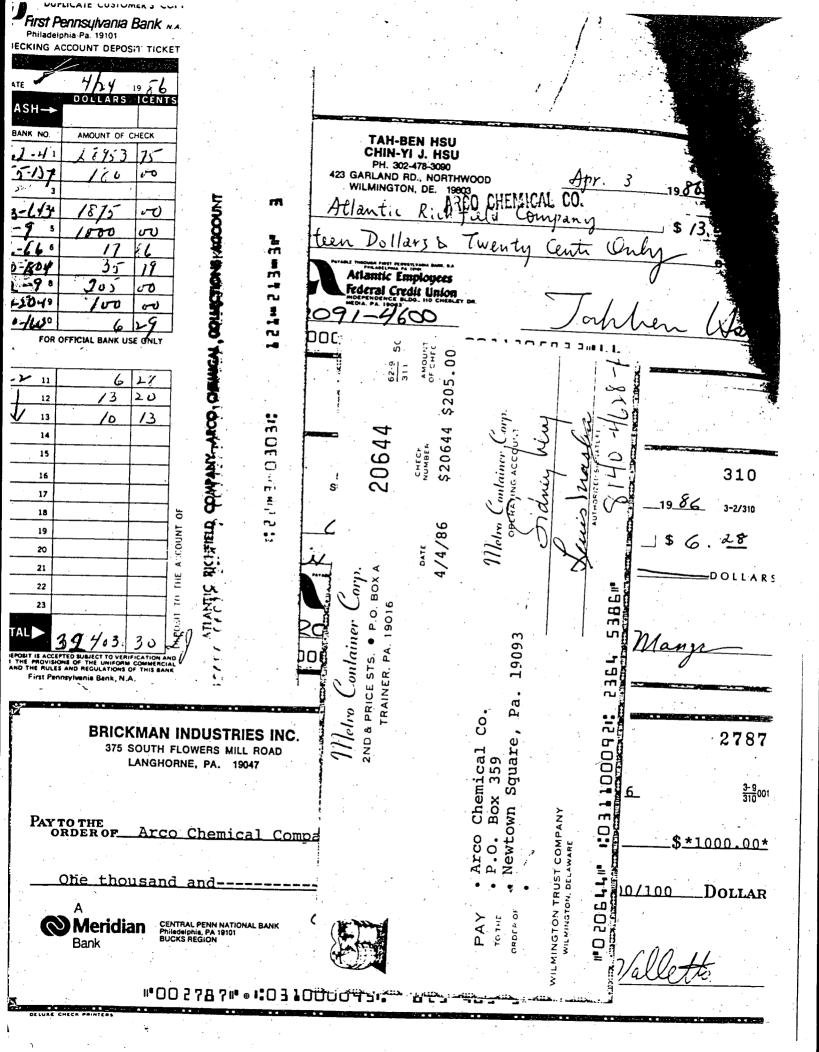
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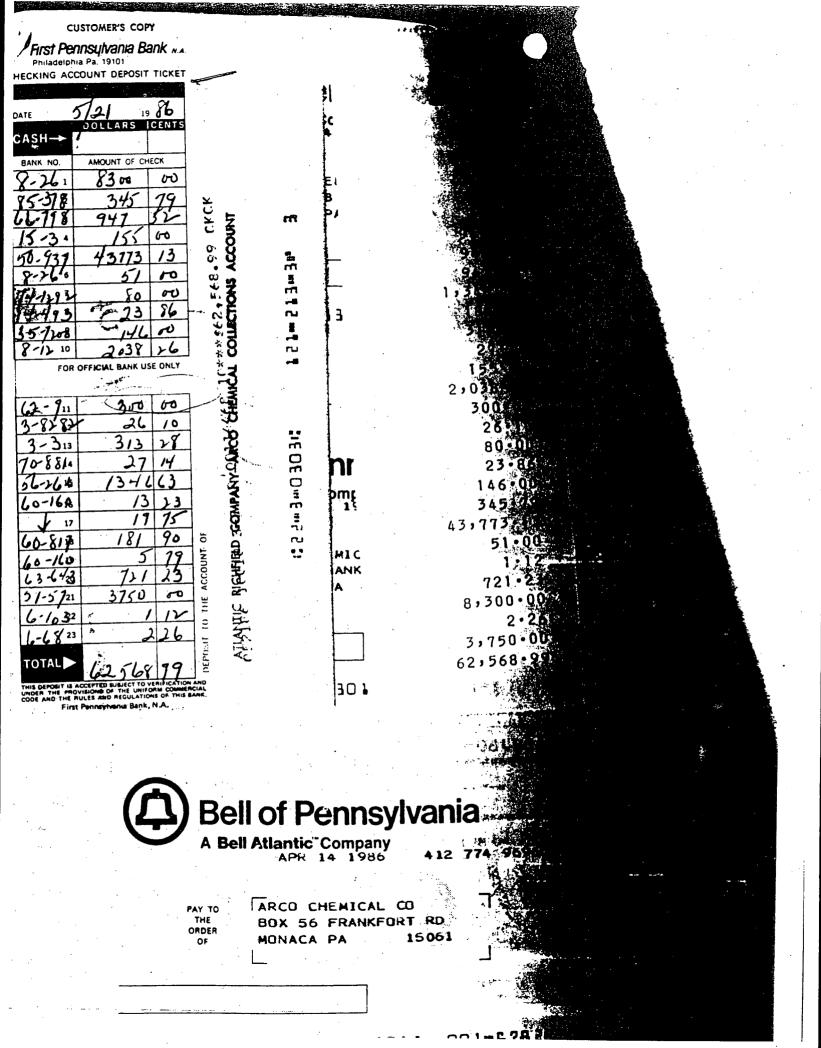
PAY TO THE ORDER OF CHEMICAL CO.

1 0 100 102 . WICHITA, KANSAS A7201 -

HEADLEE OIL CO., INC.

for french Bush







PAY

CRIPER OF

Molro Container Corp. 2ND & PRICE STS. P.O. BOX A TRAINER, PA. 19016

21534

CHECK

OF CHELL

7/2/86

21534

\$232.00

Arco Chemical Co. P.O. Box 359

Newtown Sq. Pa. 19023

Melro Conlainer Corp.

WILMINGTON TRUST COMPANY WILMINGTON, DELAWARE

AUTHORIZEE SIGNATURE

TO THE TREASURER OF

CONSOLIDATED FREIGHTWAYS



REFUND DRAFT

No. 40 - 432394

P.O. BOX 4488

PORTLAND, OREGON 97206

Branch Osgon, N.A. 24-12/1230

VOID IF NOT PRESENTED WITHIN NINETY DAYS

CHEMICAL CO

Melro Container Corp. 2ND & PRICE STS. P.O. BOX A TRAINER, PA. 19016

CHECH

AMOUNT OF CHECK

DATE

21771

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\$177.50

· Arco Chemical Co. PAY

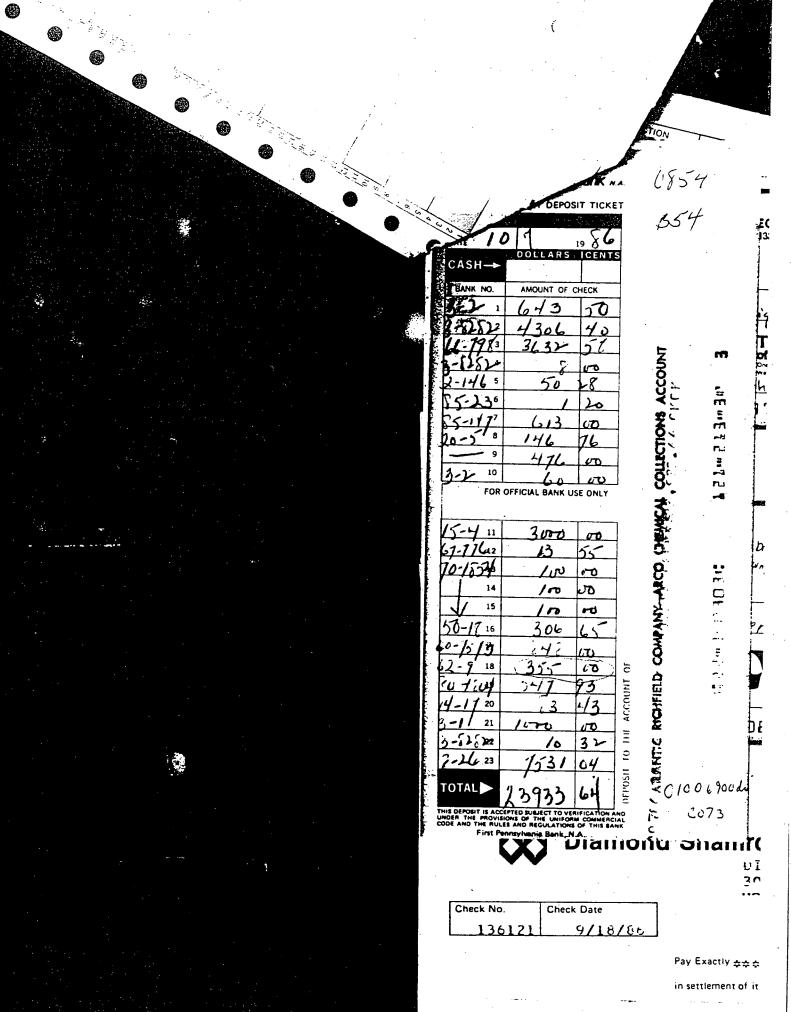
TO THE

OBDEH OF

• Box 359 Newtown Sq. Pa. 19023

WILMINGTON TRUST COMPANY WILMINGTON DELAWARE

Melro Container Corp.



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P.O. BOX A

P.O. BOX A SECOND & PRICE STREETS TRAINER, PA 19016

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CHECK 20222

PAY Three Hundred and Thirty Three & No/100

TO THE ORDER OF

ARCO CHEMICAL CO

ARCO CHEMICAL CO 3801 WEST CHESTER PIKE NEWTOWN SQUARE, PA 19023 DATE 11/21/86 AMOUNT

\$333.00 STOPERATING ACCOUNT

Sidney hay

Levis Wees la

#031100092# 2364 5386#

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METRO CONTAINER CORP.

P.O. BOX A SECOND & PRICE STREETS TRAINER, PA 19016 WILMINGTON TRUST COMPANY WILMINGTON, DELAWARE

62-9 50 311 **CHECK 20606**

PAY

TWO HUNDRED NINETY DOLLARS & 00/00

TO THE ORDER OF

ARCO CHEMICAL CO

3801 WEST CHESTER PIKE NEWTOWN SQUARE PA 19073 3-3-87

\$290.00

OPERATING ACCOUNT

AUTHORIZED SIGNATURE

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PURCHASE MEMO PLEASE NOTE CHANGE LN COMPANY NAME

Universal Container Corporation METRO Second & Price Street

Trainer, Pennsylvania 19013 (215) 494-8200 (215) 627-7288 Purchase From WELTICOL Quan. DESCRIPTION Price Amount Til Tel

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REMITTANCE ADVICE

Melro Conlainer Corp.

2ND & PRICE STS. P.O. BOX A
TRAINER, PA. 19016

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REMITTANCE ADVICE

Melro Conlainer Corp.

2ND & PRICE STS. PO. BOX A
TRAINER PA. 19016

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METRO CONTAINER
PRPS IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

	-	
COMPANY NAME	DDIME	CENT TO ME
- 	DRUMS	SENT TO METRO
MOBIL OIL COMPANY		
CHEVRON		230,493
B. P. OIL COMPANY		64,713/
B. F. OIL COMPANY	•	29,428
E. I. DUPONT		23,265 V
FRITCH FUEL CO.		21,216
ARCO PETROLEUM PRODUCTS CO.		
REX OIL CO.		15,891
SUN OIL CO.		15,271
AFCO		14,096
HOUFF TRANSFER CO.		13,182
CALLAHAN CHEMICAL CO.		12,632
JAY GRESS INCORPORATED		11,779
GULF OIL		8,867
		8,735
NATIONAL SOLVENT		7,565
WHITE OIL CO.		6,736
KAISER ALUMINUM & CHEMICAL CORP.		5,590
LANEY OIL CO. INC.	• .	5,543
J. B. HUNT TRANSPORT CO. INC.		5,031
SUPERIOR		4,622
AABCO STEEL DRUM, INC.		
MARINE LAUNCH		4,317
OCCIDENTAL CHEM & PLASTICS		3,589
PETROLEUM		3,525
CARLOS R. LEFFLER INC.		3,427
ARCO CHEMICAL CO.		3,295
JTM DRUM		3,287 ✓
ALUMAX ALUMINUM CORPORATION		3,220
CAPITAL LUBRICANTS		3,126
E. J. KOENIG		2,708
S. W. RAWLS INC.		2,506
		2,349
CONESTOGA FUEL		2,114
FISHER BODY - DIVISION OF GENERAL MOTORS		2,018
HERR'S MOTOR EXPRESS	•	1,995
D & B EXPRESS		1,963
PHOTO & ELECTRIC		1,963
SCHUCHART INC.		1,868
HOOKER & HOLLOWELL OIL CO.		
MOORE BROS. OIL CO.	••	1,834 1,794
INDUSTRIAL SOLVENTS & CHEM. CO.		
ACME INC.		1,733
SAVANNAH OIL & CHEMICAL		1,550
K. SALES INC.	•	1,448
	·	1,390
SOUTHERN LUBRICANTS	•	1,377
ILLEGIBLE		1.359

METRO CONTAINER
PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	•	-	D	RUMS	SENT	TO	METRO
	•	•	-				
DOOM OTT CO							
ROOT OIL CO.		•				413	}
LOCKER OIL CO.	•					405	,
KESSLER CHEMICAL						395	,
MANASSAS ICE & FUEL						385	
FISHER GUIDE	•					373	1.7
GB HOOBER & SONS						364	
PHILADELPHIA GEAR CORP). <u>.</u>					362	
PEDRONI FUEL CO.	*	•				346	
EASTERN INDUSTRIES						340	
STAR OIL	. •					324	
SCHULTZ LUBRICANTS						323	
VALLEY PETROLEUM INC.						319	
PEOPLES GAS & OIL					-	301	
FIRST STATE STEEL DRUM	co.					297	
DON P. MEISTER				•		291	
STOCKMAN OIL			•			288	
STROH BREWERY CO.		*				282	
STACKMAN OIL			. *				
AUTOLINE LUBRICANTS						281	
AMERICAN KOYO						276	
TAYLOR			•			276	
ATLANTIC REFINING AND I	MARKETING	3				269	
DANIELSON OIL CO.			÷			268	
PTL INTERNATIONAL						267	
OVERNITE TRANSPORTATION	N COMPANY	(264	
C. L. MACK INC.						261	
WILLIAM L. GIFT	• *			* ***;		258	
MARIN OIL SERVICE	•					252	
HOUGHTON						250	
LIBERTY OIL CO.	•					248	
ALTMAN DISTRIBUTION CO.	•				:		
DELMARVA POWER & LIGHT		. •				245	
FEGLEY OIL CO.						244	
PEOPLES OIL & GAS		•				234	
TAYLOR OIL CO.		• '				232	
MATTHEWS BROS.	•	•				232	
HERCULES CORPORATION	•	4				232	
TEVIS OIL CO.				• •		232	,
EASTERN STEEL DRUM DIV.						232. 229	
PHILA. BLECTRIC CO.	•					229	
TILLEY CHEMICAL CO.							
ERIE PETROL			·			228	
GRUMMAN AEROSPACE					and the second second	228	
MARK CAIN TRUCKING						227	
MARK CAIN IKUCKING						224	

METRO CONTAINER
PRPS IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	DRUMS SENT	TO METRO
	· · · · · · · · · · · · · · · · · · ·	
NELSON OIL CO.		162
BEALL OIL CO.		161
PETROLEUM WAND		160
B. L. JEHU		160
MCMACKIN		
STANDARD BOAT COMPANY		
TRANSAMERICA DELAVAL		159
ALLERMAN		158
W F HOBBS		157
JAMES RIVER/REGAL DIV.		156
CHARLES COAL & OIL		155
BRINKERS FUEL		152
J. O. COOK		148
BERKEBILE OIL CO.		146
PHILA. GAS WORKS		146
MCINTOSH ENERGY	the contract of the contract o	144
STANLEY OIL CO.		144
RAY PEPPELMAN INC.		142
R. J. STEPHENSON		142
POLIT FREIGHT CARRIES		
JACK A. AKEN		140 138
ST. JOHNSBURY TRUCKING		137
FALCON OIL CO.		136
ADAM UGG OIL CO.		135
L.R.WATERS		134
DIVERSIFIED LUBRICANTS		134
SHELLHORN, INC.		132
FLIPPO'S OIL CO.		132
HAHN OIL, INC.		130
SNEDECKER OIL CO.		128
HARRED OIL CO.		127
WAINWRIGHT OIL CO.		126
PROLERIZED SCHIABO		126
BETH ENERGY MINES	· · · · · · · · · · · · · · · · · · ·	126
QUARKS PETROLEUM CO	· · · · · · · · · · · · · · · · · · ·	124
WARNER OIL CO.		124
SUBURBON OIL CO.		124
CERTAIN TEED CORP.		122
SHELLHORN OIL	·	122
U.S. STEEL CORP.		121
KELLAM ENERGY	, ,	121
B.M.Y.		
DENA CORPORATION	The state of the s	119
PRINT BAY FUEL		118
FRINI DAI FUEL		117

** DRAFT ** METRO CONTAINER

PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

• •						•
COMPANY NAME		•	DRUMS	SENT	TO	METRO
		•	•			•
INTERNATIONAL TERMINAL		* .			81	•
P P & LIGHT	•				81	
C. C. GOODLING & SON					81	
EDISON PRODUCTS	•				80	•
Q PETROL					-80	
MAUGER SIMPSON					80	
ACE AUTO	,	•			80	
PETROLEUM SERVICE CO.					79	
GRAVE MFG. CO. INC.			•		79	
L. R. WATERS					78	
MARCAL PAPER		•			77	
SERVICE OIL CO. INC.		•			77	
VAROUGH OIL					76	
KELLER OIL COMPANY					76	
GREGORY OIL CO.			•		76	
SUN TRANSPORT INC.					75	
FLINCHBOUGH PRODUCTS					_	
PEPPELMAN OIL CO.			•		75	
IDEAL CORP	. *				74	
PIKE HEATING OIL					74	
KILGER & SONS INC					73	•
HIGHHOUSE OIL CO.				2	.73	
G L S INC		•			72	
BECHTEL INC.		·			72	
GENERAL TIRE & RUBBER CO.					72	•
AMERICAN CAN CO.	•				71	
		•			70	
NEAPCO PRODUCTS INC.					69	
ENRIGHT OIL					68	
NEVILLE ISLAND TERMINAL			•		68	
FILGER CO.		•			68	
CRESENT INDUSTRIES INC.					66	
S. LEASE WARNER				,	65	
INGERSOLL RAND EQUIPMENT	CORP.				65	*
O'SULLIVAN CORPORATION		•			64	
ARLINGTON SCHOOL BOARD			• • •		64	
HUTTER INC.				•	64	* .
DREW CHEMICAL	•				64	
NEW YORK BUS COMPANY			,		64	
HOEGANES					64	
SOUTHWORK COOPERAGE					62	
W. C. SALES INC.			7.		62	
INLAND TERMINAL						
•			•		61	
BALTIMORE GAS & ELECTRIC					61	
SILBERLINE MFG CO INC				٠.	60	

METRO CONTAINER
PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME		DRUMS	SENT	то	METRO
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H. J. TANNER INC.				3 3	•
RHODES DRUMS		•		33	
OKLAHOMA OIL CO.				- 33	*
A D A MDANCDODM	e at a			33	J
A. P. A. TRANSPORT MABRAK LINE				. 32	}
COORDINATED TRANSPORT INC.					
	•			32	
E.C. BARNES, INC				3.2	
SUPERIOR CARRIERS	•				
M C		·		31	
DAVIDSON STORE CO				3.0)
DUNMORE OIL CO.	* .		*, *	30)
CATAWISSA VALVE					
GREAT LAKES DREDGE	,	* *	3	30)
W. BUNTING & SON				29)
ALIROEL	•			29	1
V.C. GOODLING & SON				29	,
COUNTRY AUTOMOTIVE WACRER COMPANY	•		٠.	28	
WACRER COMPANY	•		•	28	
ELCO & HAUSMAN CONSTRUCTION				. 21	
SMITH OIL CO. SUFFOLK CHEMICAL				. 27	
SUFFOLK CHEMICAL	•			27	
F. GAILEY AIR DELIVERY SERVICE	· · · · · · · · · · · · · · · · · · ·			27	
	•				
S. BUNTING & SONS				- 26	١
MAIDEN CREEK FARM SUPPLY			• •	26	,
FOGLIA				20	
PETROLEUM PRODUCTS CORP.		•			
WEEKS ENGINEERING		n' .		25	
UNITED OIL & BELTING		*		25	
PA. METALLURGICAL INC.				24	
CARL BICKER INC.				24	
RED'S OF JEFFERY INC.				24	
FULLER COMPANY				23	
PAUL ORKIN T/A PAULS CHEVY			. 1	23	
MERCH AND CO. INC.	•		180	23	
NORMAN BRIGHT INC.	•	, «		22	
FERMSTONE OIL CO.			•	22	
GREAT SOUTHERN				21	
REINER OIL		. ,		21	
ULTRA POWER	No.			21	:
PRECISION COMPONENTS CORP.			200	21	
READING COMM				20	
EGGERS CARYL CORRIGAN	* * * * * * * * * * * * * * * * * * *	· .		20),

METRO CONTAINER
PRPS IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME	DRUMS	SENT TO METRO
YORK OIL SERVICE		13
TRANSPORTATION SUPPLIES INC.		13
APPLETON PAPERS		13
A. M. P. INC.		13
POLORON PRODUCTS		13
M & M MARS		13
BAKER & RUSSELL INC.	•	13
F & W AUTO PARTS		13
A. P. A. LEASING		12
ZIEGLER CHEMICAL		12
CALL CHROMYCAL		12
WEIER NC		12
TEASEWAY PURCHASING COPP		12
PITT APPLIED PESEARCH		12
SUPERIOR BUILDING		
LEASEWAY PURCHASING CORP PITT APPLIED RESEARCH SUPERIOR BUILDING LEATZ MILLING CO.		12 11
CMITTU BRATUFRE		11
PALMYRA INDUSTRIES	•	
U.S. POST OFFICE	• .	11
TULLEY CHEMICAL		11
SKF INDUSTRY	•	11
MITCHELL TIRE	•	11
JET BLAST		11
LEASE WARNER		10
L F TAYLOR INC		10
WOODLAWN OIL		10
GEARS BECK ENTERPRISE		10
J W WHITE TRUCK CENTER		10
STIFF OIL CO.	•	10
R C A	*	10
EASTERN FREEZE CO.	:	10
ROADWAY EXPRESS CORP.		10
RALPH BRASHER		10
RYDER TRUCK RENTAL		10
WASHINGTON T.B.A. CENTER		10
TAYLOR PACKING CO		10
	•	
PLANT #2		9
NEWMAN CO.		
JAMES RIVER & DIXIE NORTHERN		9
EAST COAST RAILROAD		9
THEODORE PANACCION		9
WASNICKS-AUTO SUPPLY	•	9
SENICK INC	A Commence of the Commence of	9
LOOMIS ARMORED INC.		9
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METRO CONTAINER

PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME		DRUMS	SENT	TO	METRO
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YORK DRILLING CO. INC. A. ULRICH	,			5	
ACCURATE SCREWING				5	•
WHITCHALL CEMENT				5	
WEISS MARKETS INC.			•	5	
BOB RHONE					
BORO OF CHAMBERSBURG			•	5) -
PUREX CORP.					•
BRIDON AMERICAN CORP.				5	
COCA COLA				-	,
CRAMCO OIL			•	9	, ,
PORT BUS SERVICE				5	
E. E. KOUCH & SONS				5	
A. SULLIVAN CORP.		. •	4	5	
POH-BAS SERVICE	•			5	,
EICKELBERGER WELL DRILL, INC.				5	· ·
HONEYWELL TRANSFER				5	
STATE LIVE OIL				5	5
FAIRCHILD WESTON	•			5	;
TOOL SALES SERVICES				. 5	5
HARDESTY & MONROE			•	5	,
M. CLAUSERINGS		**		5	;
GLASCOW				. 5	
HOPPERS CO.				5	j.
I.R.I.			٠.	5	;
MUNCY MACHINE & TOOL				5	
MONGAN CK			•	5	
JOE SEAGRAM				. 5	,
PARTS ELEVATOR				4),
SCLEK OPTICAL			•	4	١,
PACKAGING CORP OF AMERICA	•		•	4	,
SALES	-		•	4	r
YOST M KUNTZ INC		* *		. 4	, ·
FRANCIS SMITH & SONS	*			4	•
WILSON FORGING				4	!
WHITEHALL CEMENT			•	4	١.,
BAKER INDUSTRIES			•	4	
U.P.S.			* *	4	٠.
CHAMPION VALLEY				. 4	l e.
SUBURBAN PROPANE	•			4	ta di Paga
C H MASLAND				4	
EQT		•		4	

DESOUSA OIL SERVICE BRISTOL STEEL

METRO CONTAINER

PRPs IN ORDER OF DRUMS CONTRIBUTED (1985, 1986, AND 1987)

COMPANY NAME

DRUMS SENT TO METRO

METALLURGICAL PROC. UNILED OIL P.M.E. CO. DEFAZIO EXPRESS HICKLEYS AUTO EXP. BALTIMORE AUTO DAILY EXPRESS M.S. REICHENBACK LEBANON MACHINE T. EPSTEIN AND SONS YEASLEY SERVICE REYNOLDS METAL CORP. AMES SUPPLY WILGER & SON INC AMPIN STEEL CAST R. S. MASTERS M S M SERVICE CO. CARRIER AIR R & L MACHIRE KANCCH-BEIYLES CONSTRUCTION SYSTEMS PRESS ENTERPRISE C A SPALDING CO A. E. WALKER INC. MASLAND CO. M. COBLEN SONS PROCTOR EXPRESS QANES ALLOY. CASTING CO BAUSERMAN OIL CO U.S. AGRICULTURE CHEMICAL INC. PETES T/A DJW KEYSTONE SCREW CARMINZ-ZAPPARDINO AVIS RENT-A-CAR TURNMATIC INC HOWARD ASAL POTTSVILLE BLEACH & DYING CO ELECTRICAL MAINT WILEY CORK CO BLACK & DECKER BAY PROD ERB BROTHERS TONY LEININGER POMONS OIL CO.